

From: Greaver, Tara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=87AAAE6C3784C4BA57193CDB5BA84F4-GREAVAR, TARA]
Sent: 10/11/2018 2:18:59 PM
To: Sacks, Jason [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2099bec11ced4d5c88c07a89aa8ee652-Sacks, Jason]; Vandenberg, John [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=dcae2b98a04540fb8d099f9d4dead690-Vandenberg, John]; Dutton, Steven [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=795a1526feec425f8be0b3f5c0a671c6-Dutton, Steve]; Luben, Tom [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=46cb3b80168845c596cb089e872a2c41-Luben, Tom]; Lassiter, Meredith [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=7ded5434987049279312097f28ec4dfc-Lassiter, Meredith]
Subject: Re: NAAQS Review - Inside EPA

Yikes! The highlighted statement is true though. NOxSOxPM has taken since 2013 to complete just the ISA. It wasn't an assessment built for speed with 4 staff and 1 or 2 postdocs. It's goes back to the trade offs. The Administrator can streamline the NAAQS review process to some extent, and try to have one CASAC meeting, but then the Agency will have to figure out how many staff and other resources they want to give this process if they want the assessments done quickly.

From: Sacks, Jason
Sent: Thursday, October 11, 2018 7:22:34 AM
To: Vandenberg, John; Dutton, Steven; Greaver, Tara; Luben, Tom; Lassiter, Meredith
Subject: NAAQS Review - Inside EPA

I don't know about you, but I take offense to the highlighted statement below.

Wehrum calls for dramatic acceleration of NAAQS reviews

October 10, 2018

Bill Wehrum, head of EPA's Office of Air & Radiation, is calling for dramatic acceleration of the process the agency uses to review its national ambient air quality standards (NAAQS), aiming for completed reviews in as little as three and a half to four years -- a far shorter timeframe than the agency typically achieves.

"We have to reinvent" what we do when reviewing the agency's six NAAQS, Wehrum told a recent meeting of the Clean Air Act Advisory Committee (CAAAC) in Arlington, VA.

"We need a way of doing NAAQS reviews that not just gets them done, but gets them done comfortably" within statutory deadlines, Wehrum said.

The Clean Air Act requires EPA to review its NAAQS, set for criteria pollutants like ozone and particulate matter (PM), every five years. But EPA has routinely taken far longer to complete reviews.

The Trump EPA has set a goal of completing the next ozone review on time, by Oct. 1, 2020, five years after the Obama administration issued its toughened ozone standard of 70 parts per billion. EPA further wants to complete its already-overdue review of the PM NAAQS, last reviewed in 2012, by December 2020.

Achieving such ambitious schedules will require a fundamental shift in the way EPA reviews NAAQS, likely with less consultation of the Clean Air Scientific Advisory Committee (CASAC) that advises EPA on how to set the NAAQS, and possibly reducing the number of steps in the review process.

Currently, EPA produces an integrated review plan to chart the course of a review, an integrated science assessment to synthesize the latest available science, sometimes a risk and exposure assessment to weigh risks to the population, a policy assessment to present the administrator with policy options, and then proposed and final rules either changing the NAAQS, or leaving them in place.

Former Trump EPA Administrator Scott Pruitt in a May 9 memo outlined his vision of a faster process, possibly with fewer steps, before resigning in July following a series of ethics scandals.

Pruitt also required CASAC to dispense advice on issues it has previously avoided addressing, such as the technical feasibility and implementation costs of NAAQS. Although the committee is mandated by the air law to do so, it has never reviewed such issues, and critics argue that Supreme Court precedent bars EPA from weighing these issues in setting NAAQS, given that the limits must be set based on data about threats to public health and the environment.

But Ted Steichen, representing the American Petroleum Institute (API), at the Sept. 26 CAAAC meeting expressed his concern that EPA's Office of Research and Development (ORD) is not making the necessary changes.

Citing the traditional process now unfolding in EPA's review of "secondary," or welfare-based NAAQS for nitrogen oxides, sulfur oxides and PM, Steichen said ORD **"still doesn't know how else to do it."**

He also questioned whether EPA has given specific direction to the agency's independent Science Advisory Board (SAB), which manages CASAC, on how to speed up reviews.

API in its comments to EPA on the ozone NAAQS review has advocated a substantially shorter review process, with fewer drafts of documents and less repeated consultation of CASAC.

Wehrum answered that first Pruitt, and now Acting EPA Administrator Andrew Wheeler, support the ambitious schedule for ozone and PM, and "we work backwards from there."

EPA has in the past consulted CASAC multiple times during reviews, sometimes on several drafts of the same document. "We need to be a bit smarter about when and where we go back to CASAC," Wehrum said.

He compared reviewing NAAQS to "driving a supertanker. You need to be turning the wheel early and often" to get the "bow to come around."

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